

Etan Zaitso [CA SBN 287106]
Attorney at Law

Zaitso Law
331 J Street, Suite 200
Sacramento, CA 95814
(916) 542-0270
etan@zaitso.com

Attorney for Defendant
ABNER ESTRADA CRUZ

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ABNER ESTRADA CRUZ,

Defendant.

Case No.: 2:24-CR-00247 DAD

**STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE**

STIPULATION

Defendant Abner Estrada Cruz, by and through his undersigned counsel, and Plaintiff United States of America, by and through its counsel of record, hereby stipulate and request that the Status Conference previously set for May 8, 2025, be continued to August 7, 2025 at 9:00am. The defendant further agrees to waive time under the Speedy Trial Act pursuant to Local Code T4, defense preparation, up to and through the August 7, 2025 date.

In support of this stipulation, the parties request that the Court find the following:

1. By previous stipulation and order, the Status Conference in this matter was set for May 12, 2025. Upon reassignment of this case to the Honorable Judge Calabretta, this Court reset the Status Conference *sua sponte* to May 8, 2025.
2. To date, defense counsel has received 500-600 pages of documents and numerous

recordings.

3. At this time, counsel for defendant requires additional time to conduct investigation and research related to the charges, review discovery for this matter, discuss potential resolutions, and to otherwise prepare for trial.
4. The parties stipulate that the failure to grant the above-requested continuance would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5. For the purposes of calculating time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., the parties agree and request that the time period from May 8, 2025 to August 7, 2025, inclusive, be excluded under 18 U.S.C. § 3161(h)(7)(A), B(iv) (Local Code T4) upon such finding by the Court that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Dated: May 5, 2025

/s/ETAN ZAITSU

ETAN ZAITSU
Counsel for Defendant
ABNER ESTRADA CRUZ

Dated: May 5, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ KRISTIN SCOTT

KRISTIN SCOTT
Assistant United States Attorney

ORDER

IT IS SO ORDERED that the status conference currently scheduled for May 8, 2025 is hereby continued to August 7, 2025 at 9:00am. It is further ordered that the time period between these dates is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), Local Code T4 as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO FOUND AND ORDERED this 5th day of May, 2025.

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE